

## **REMARKS**

Claims 1, 9, 17, 24, and 25 stand rejected under 35 U.S.C. § 112, first paragraph as failing to comply with the written description requirement. Claims 1, 2, 4, 6-12, 14-20, 22, and 23 stand rejected under 35 U.S.C. § 103(a) as being anticipated by United States Patent Number 7,093,088 to Todd et al. (hereinafter Todd), United States Patent Number 6,804,690 to Dysert et al. (hereinafter Dysert), and “Inside Windows Storage: Server Storage Technologies for Windows 2000, Windows 2003, and Beyond.” By Naik (hereinafter Naik). Claim 24 stands rejected under 35 U.S.C. § 103(a) as being anticipated by Todd, Dysert, Naik, and in further view of Vicom System SCSI-Fibre Channel Router (hereinafter Vicom). Claim 25 stands rejected under 35 U.S.C. § 103(a) as being anticipated by Todd, Dysert, Naik, and in further view of Innovation Data Processing (hereinafter IDP).

Applicants thank the Examiner for the telephone interview of May 31, 2007. We discussed a proposed amendment to the claims. The Examiner suggested several language changes that the Applicants agreed to incorporate as additional amendments.

### **Amendments to the Claims.**

Applicants have amended claim 1 with the limitations of claims 2, 7, and 8, claim 9, with the limitations of claim 10, 15, and 16, and claim 17 with the limitations of claims 18, 23, and 8.

Claim 1 is also amended to read “...a server interfacing with a plurality of data storage devices ...” as suggested by the Examiner. Applicants also removed the word “substantially” from the amendments to claims 1, 9, and 17 as suggested. Claims 2, 6-8, 10, 11, 14-16, 18, 19, and 22-25 are canceled.

Response to rejections of claims under 35 U.S.C. § 112, first paragraph

Claims 1, 9, 17, 24, and 25 stand rejected under 35 U.S.C. § 112, first paragraph as failing to comply with the written description requirement. With regards to claims 1, 9, and 17, the Examiner cites the limitation "...a target volume having the target LUN on the SCSI bus..." Office Action of March 19, 2007, page 2, lines 11-12. Applicants have amended claims 1, 9, and 17 to remove this limitation. In addition, Applicants have canceled claims 24 and 25.

Response to rejections of claims under 35 U.S.C. § 103(a)

Claims 1, 2, 4, 6-12, 14-20, 22, and 23 stand rejected under 35 U.S.C. § 103(a) as being anticipated by Todd, Dysert, and Naik. Claim 24 stands rejected under 35 U.S.C. § 103(a) as being anticipated by Todd, Dysert, Naik, and in further view of Vicom. Claim 25 stands rejected under 35 U.S.C. § 103(a) as being anticipated by Todd, Dysert, Naik, and in further view of IDP. Applicants respectfully traverse these rejections.

Applicants have amended claims 1, 9, and 17 with the limitation of requesting data as a bit image "...cylinder by cylinder, track by track, and bit by bit..." Claims 1, 9, and 17 as amended. Todd does not teach a cylinder by cylinder, track by track, and bit by bit bit image request but instead discloses that migrating "...logical objects that are not limited to a single set of logically related data." Todd, col. 48, lines 7-9. Dysert and Naik also do not teach requesting data as a bit image cylinder by cylinder, track by track, and bit by bit. US Patent 6,145,066 to Atkin (hereinafter Atkin) previously cited teaches reading all tracks, and reading a single track

from a specified volume, but does not teach reading cylinder by cylinder, track by track, and bit by bit. Atkin, col. 85, lines 4-7. Applicants therefore submit that because Todd, Dysert, and Naik do not teach each element of claims 1, 9, and 17, claims 1, 9, and 17 are allowable. Applicants further submit that claims 4, 12, and 20 are allowable as depending from allowable claims. Claims 2, 6-8, 10, 11, 14-16, 18, 19, and 22-25 are canceled.

### Conclusion

As a result of the presented remarks, Applicants submit that the application is in condition for prompt allowance. Should additional information be required regarding the traversal of the rejections of the claims enumerated above, Examiner is respectfully asked to notify Applicants of such need. If any impediments to the prompt allowance of the claims can be resolved by a telephone conversation, the Examiner is respectfully requested to contact the undersigned.

Respectfully submitted,

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